

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

EIG ENERGY FUND XIV, L.P., :
EIG ENERGY FUND XIV-A, L.P., :
EIG ENERGY FUND XIV-B, L.P., :
EIG ENERGY FUND XIV (CAYMAN), L.P., :
EIG ENERGY FUND XV, L.P., :
EIG ENERGY FUND XV-A, L.P., :
EIG ENERGY FUND XV-B, L.P., and : Case No. 18-cv-01047-PGG
EIG ENERGY FUND XV (CAYMAN), L.P., :
:
Plaintiffs, :
:
- against - :
:
KEPPEL OFFSHORE & MARINE LTD., :
:
Defendant. :
:
X

NOTICE OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, Plaintiffs EIG Energy Fund XIV, L.P., EIG Energy Fund XIV-A, L.P., EIG Energy Fund XIV-B, L.P., EIG Energy Fund XIV (Cayman), L.P., EIG Energy Fund XV, L.P., EIG Energy Fund XV-A, L.P., EIG Energy Fund XV-B, L.P., and EIG Energy Fund XV (Cayman), L.P. (collectively, "EIG" or "Plaintiffs"), upon their Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment, Rule 56.1 Statement of Undisputed Facts, Appendix and accompanying Exhibits 1-136 in Support of Plaintiffs' Motion for Summary Judgment, and Declaration of Drew Moroux, by and through the undersigned counsel, will move this Court before the Honorable Paul G. Gardephe, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment to Plaintiffs and

awarding Plaintiffs at least \$819,854,655.05 in compensatory damages, prejudgment interest,¹ and punitive damages.

Dated: New York, New York
September 20, 2021

Respectfully submitted,

KRAMER LEVIN NAFTALIS &
FRANKEL LLP

By: /s/ Daniel B. Goldman
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Attorneys for Plaintiffs

¹ Plaintiffs reserve the right to update the prejudgment interest calculation to reflect interest accrued up to the date of judgment.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September 2021 I caused to be delivered a true and accurate copy of the foregoing Notice of Plaintiffs' Motion for Summary Judgment, as well as all attached and accompanying documents and exhibits, including Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment, Plaintiffs' Rule 56.1 Statement of Undisputed Facts, Appendix and accompanying Exhibits 1-136 in Support of Plaintiffs' Motion for Summary Judgment, and Declaration of Drew Moroux, on all counsel of record via electronic mail.

/s/ Shaked Sivan
Shaked Sivan